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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JANET GARCIA, *ET AL*,

Plaintiffs,

v.

CITY OF LOS ANGELES, A
MUNICIPAL ENTITY

Defendants.

CASE NO. 2:19-cv-06182-DSF-PLA

[Assigned to the Hon. Paul L. Abrams
– Courtroom 780)

DISCOVERY MATTER

**PLAINTIFFS' NOTICE OF
MOTION TO COMPEL
DEFENDANT CITY OF LOA
ANGELES'S RESPONSE TO
PLAINTIFFS' REQUEST FOR
PRODUCTION OF DOCUMENTS
(SET ONE)**

Hearing Date: April 28, 2021
Time: 10:00 a.m.

Complaint Filed: July 18, 2019
Discovery Cut-off: July 26, 2021
Pretrial Conf: Feb. 14, 2022
Trial: March 14, 2022

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27 *Association for Responsible and Equitable Public*
28 *Spending*

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on April 28, 2021, at 10:00 a.m., or as soon thereafter as counsel may be heard by the above-entitled Court, located at 255 E. Temple Street, Los Angeles, California 90012, Courtroom 780, 7th Floor in the courtroom of the Honorable Paul L. Abrams, Plaintiff will and hereby does move the Court for an order compelling the City to produce documents responsive to Plaintiffs' Requests for Production of Documents. This motion is brought on the following grounds: Plaintiffs' requests are relevant to the claims alleged, are time-limited and seek the production of discrete and specific document requests. The requests are proportional to the needs of the case, given the Constitutional issues at stake, the parties' resources and relative access to relevant information, and the importance of discovery in resolving the issues. Defendant has failed to provide written responses that comply with Rule 34 of the Federal Rules of Civil Procedure and has withheld documents that are both highly relevant and necessary to prove Plaintiffs' claims and defeat Defendant's defenses. Plaintiffs are entitled to full and complete responses to requests for production of documents and the production of all relevant, responsive documents.

Pursuant to Local Rule 37-1, the parties' counsel met and conferred regarding this motion initially on August 25, 2020 and have had significant communications and meetings thereafter. Plaintiffs have met the requirements for the preparation of the joint stipulation contained in the Federal Rule of Civil Procedure 37 and Local Rule 37 et al. (Declaration of Shayla Myers attached thereto). The Scheduling Order is attached as Appendix A and the Amended Scheduling Order is attached as Appendix B.

This motion is based on this Notice of Motion, the Joint Stipulation filed herewith, the declarations of Shayla Myers and Adrian Riskin, and upon such other matters as may be presented to the Court at the time of hearing.

Dated: April 7, 2021

Legal Aid Foundation of Los Angeles,
Schonbrun Seplow Harris Hoffman and Zeldes, LLP
Kirkland & Ellis, LLP

By: /s/ Shayla Myers

Shayla Myers Attorney for Plaintiffs